

INTERROGATORIES TO THE JURY

1. Do you find that defendant Erie School District had actual knowledge of the harassment of plaintiff Rachel P. by other students after the December 19, 2001 rapes?

Yes _____ No X

(If your answer to Question 1 is "Yes," go to Question 2. If your answer to Question 1 is "No," go to Question 6.)

2. Do you find that defendant Erie School District acted with deliberate indifference to the known harassment of plaintiff Rachel P. by other students after the December 19, 2001 rapes?

Yes _____ No _____

(If your answer to Question 2 is "Yes," go to Question 3. If your answer to Question 2 is "No," go to Question 6.)

3. Do you find that the deliberate indifference of defendant Erie School District caused plaintiff Rachel P. to suffer harassment or made her more vulnerable to harassment?

Yes _____ No _____

(If your answer to Question 3 is "Yes," go to Question 4. If your answer to Question 3 is "No," go to Question 6.)

4. Do you find that the harassment caused injury to plaintiff Rachel P.?

Yes _____ No _____

(If your answer to Question 4 is "Yes," go to Question 5. If your answer to Question 4 is "No," go to Question 6.)

5. What are the total damages suffered by plaintiff Rachel P. that were caused by the harassment?

Total Damages: \$ _____

(Go to Question 6.)

6. Do you find that defendant Erie School District had actual knowledge of the harassment of plaintiff Kristina L. by other students after the December 19, 2001 rapes?

Yes _____ No X

(If your answer to Question 6 is "Yes," go to Question 7. If your answer to Question 6 is "No," go to Question 11.)

7. Do you find that defendant Erie School District acted with deliberate indifference to the known harassment of plaintiff Kristina L. by other students after the December 19, 2001 rapes?

Yes _____ No _____

(If your answer to Question 7 is "Yes," go to Question 8. If your answer to Question 7 is "No," go to Question 11.)

8. Do you find that the deliberate indifference of defendant Erie School District caused plaintiff Kristina L. to suffer harassment or made her more vulnerable to harassment?

Yes _____ No _____

(If your answer to Question 8 is "Yes," go to Question 9. If your answer to Question 8 is "No," go to Question 11.)

9. Do you find that the harassment caused injury to plaintiff Kristina L.?

Yes _____ No _____

(If your answer to Question 9 is "Yes," go to Question 10. If your answer to Question 9 is "No," go to Question 11.)

10. What are the total damages suffered by plaintiff Kristina L. that were caused by the harassment?

Total Damages: \$ _____

(Go to Question 11.)

11. Do you find that defendant Linda Cappabianca made a defamatory communication to Robin Johnson and Toni Northrup that related to plaintiff Rachel P.?

Yes _____ No X

(If your answer to Question 11 is "Yes," go to Question 12. If your answer to Question 11 is "No," inform the Court Clerk that you have reached a verdict.)

12. Do you find that the defamatory communication by defendant Linda Cappabianca to Robin Johnson and Toni Northrop caused injury to plaintiff Rachel P.?

Yes _____ No _____

(If your answer to Question 12 is "Yes," go to Question 13. If your answer to Question 12 is "No," inform the Court Clerk that you have reached a verdict.)

13. What are the total damages suffered by plaintiff Rachel P. that were caused by the defamatory communication?

Total Damages: \$ _____

(Go to Question 14.)

14. Do you find that the defendant Linda Cappabianca made the defamatory communication with a bad motive or with reckless indifference to the interests of plaintiff Rachel P.?

Yes _____ No _____

(If your answer to Question 14 is "Yes," go to Question 15. If your answer to Question 14 is "No," inform the Court Clerk that you have reached a verdict.)

15. What are the total punitive damages that you award to plaintiff Rachel P. against defendant Linda Cappabianca?

Total Punitive Damages \$ _____

Each juror must sign this verdict form.

Kristina S. Cozz
Foreperson

Amanda K. K. M. 1/30/06
Juror

See A. Gause 1/30/06
Juror

Anthony McCochran 1/30/06
Juror

Margaret A. Stine 1/30/06
Juror

Jan. 30, 2006
Date

Lisa Zimmerman 1-30-06
Juror

Frank J. Strung 1/30/06
Juror

Jerome S. 1/30/06
Juror